

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

BRIAN HUDGINS, on his own
behalf and on behalf of those
similarly situated,

Plaintiffs,

CASE NO.: 1:16-CV-7331 16-CV-7331

vs.

TOTAL QUALITY LOGISTICS, LLC,

Defendant. _____/

**PLAINTIFFS' UNOPPOSED MOTION TO
PERMIT SPECIAL APPEARANCE AT TRIAL**

Plaintiff, BRIAN HUDGINS, on behalf of himself and the Opt-In Plaintiffs who have joined and remain in this matter (collectively, "Plaintiffs"), hereby respectfully moves this Court for an Order permitting special appearance at trial, specifically, Plaintiffs' retained jury consultant, Jury-X, to join Plaintiffs' Counsel at Counsels' trial table, and in support thereof states as follows:

1. On July 19, 2016, shortly after the filing of the initial complaint, this matter was assigned to the Honorable Matthew F. Kennelly.
2. On August 23, 2019, pursuant to an Executive Committee Order, this case was reassigned to Honorable Martha M. Pacold. [D.E. 221].
3. Jury trial was originally set for March 30, 2020, through April 10, 2020, before Judge Pacold. The Parties exchanged trial documents and attended multiple status conferences in preparation for the March 30, 2020, trial.

4. During previous trial preparations, Judge Pacold agreed to permit Plaintiffs' retained jury consultant, Jury-X, to attend trial at Counsels' table. However, on March 13, 2020, the jury trial set to begin on March 30, 2020, was cancelled in compliance with the General Order related to the Covid-19 pandemic.

5. On April 1, 2024, the case was reassigned back to Judge Kennelly. [D.E. 415].

6. After a status conference was held on April 10, 2024, trial in this matter was rescheduled to begin on September 30, 2024. [D.E. 418].

7. Plaintiffs respectfully request that this Court continue to permit Plaintiffs' previously retained jury consultant, Jury-X, to attend and sit at Counsels' trial table during jury selection at the September 30, 2024, trial.

8. Plaintiffs believe the assistance of a jury consultant during the limited voir dire process during this two-week long collective action trial will further the administration of justice.

9. Based on the foregoing, Plaintiffs respectfully request entry of an Order permitting the attendance of their previously retained jury consultant, Jury-X, to join Plaintiffs' Counsel at Counsels' trial table, or at minimum, be permitted to attend voir dire and jury selection in the courtroom on behalf of the Plaintiffs.

CERTIFICATE OF CONFERRAL

Pursuant to Local Rule 37.2, undersigned counsel contacted counsel for Defendant on August 21, 2024, regarding the relief requested in this Motion, and has been

authorized by counsel for Defendant to represent to this Court that Defendant **does not object** to the relief requested.

WHEREFORE, Plaintiffs respectfully request the entry of an Order permitting the attendance of Plaintiffs' jury consultant to join Plaintiffs' Counsel at Counsels' table at trial during the voir dire and jury selection process.

Dated: August 22, 2024.

/s/ Kimberly De Arcangelis
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the above and foregoing document has been furnished to the Clerk of the Court using the CM/ECF System which I understand will send notice to all counsel of record, this 22nd day of August, 2024.

/s/ Kimberly De Arcangelis
Kimberly De Arcangelis, Esq.